

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

v.

No. 2:15-cr-04268-JB

ANGEL DELEON, et al.,

Defendants.

DEFENDANTS' JOINT SUPPLEMENTAL WITNESS LIST

Defendant Rudy Perez, by counsel, Ryan J. Villa and Justine Fox-Young, Defendant Anthony Ray Baca, by counsel Theresa Duncan and Marc Lowry, Defendant Daniel Sanchez, by counsel Richard Jewkes and Amy Jacks, Defendant Christopher Garcia, by counsel Amy Sirignano and Christopher Adams, Defendant Carlos Herrera, by counsel Carey Bhalla and William Maynard, file the following supplemental list of witnesses they may call at trial. This witness list supplements Defendants' previously filed witness lists. *See* Docs 1477, 1479, 1483, 1496, and 1510. Defendants reserve the right to introduce testimony from additional witnesses subsequent to the Government's disclosure pursuant to *Jencks v. United States*, the Government's production of additional discovery, and the defendants' review of those materials.

1. James Mulheron (NMCD)
2. William Edgman (NMCD)
3. Amy Guerrero
4. Crystal Salas
5. Darren White
6. Phil White
7. Brack Rains
8. Kresten Eoff (NMCD)
9. Corey Henn (NMCD)
10. Robert Sanchez
11. Jesse Sedillo
12. Andre Lamar Green
13. John Watts
14. Ty Stevens
15. Sandy Rayel
16. Michael P Currier
17. Roy Lee Leon

18. Gary Ainsworth
19. Peso Chavez
20. Christian Filipiak
21. Andy Primm
22. Jacob Gomez
23. Julie Lopez
24. Keith Miller
25. Jonathan McPherson
26. Estevan Flores
27. Robert Cathey
28. Jodi Upshaw
29. Ronald Cardon
30. Custodian of Records from The Evolution Group
31. Custodian of Records from Central New Mexico Community College
32. Any necessary records custodians to authenticate the medical or disciplinary records of the defendants and the disciplinary records of any of the Government's civilian witnesses
33. Any witness named or called by the Government
34. Any witness necessary for impeachment

Respectfully submitted,

THE LAW OFFICE OF RYAN J. VILLA

/s/ Ryan J. Villa

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AND

JUSTINE FOX-YOUNG, P.C.

/s/ Justine Fox-Young

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 12th day of January, 2018, I filed the foregoing pleading electronically through the CM/ECF system, which caused counsel for Plaintiff and Defendants to be served by electronic means, as more fully reflected on the Notice of Electronic Filing.

/s/ Justine Fox-Young
Justine Fox-Young

